

## Remarks

Reconsideration of this application is respectfully requested.

Claims 15-19 are rejected under 35 USC 102(e) as being anticipated by Carlucci et al. Claim 15, from which claims 16-19 depend, calls for "...a pair of the tufts being ***tilted*** in substantially the same direction ***relative to the support member...***" Webster's Ninth New Collegiate Dictionary defines "tilt" as to incline or slant. The Examiner asserts that in Carlucci "any pair of tufts...appear to be tilted at about 90 degrees or about perpendicular to the support member". The Examiner's view of the meaning of the word "tilt" flies in the face of the dictionary definition above and how Applicants have used the word "tilt" in the detailed description. Applicants have described tufts 20, 22, 24 and 26 as being tilted relative to the top surface of the head. Figures 1 and 3 of the instant application clearly show that tufts 20, 22, 24 and 26 are inclined or slanted relative to the top surface of the head. If one skilled in the art were asked if any of the bristle tufts in figure 3 of Carlucci are tilted relative to the top surface of the head, the answer would clearly be "no" because none of these tufts are slanted or inclined relative to this surface. Accordingly, claim 15 and its dependent claims are not anticipated by Carlucci.

Claims 1, 3-4, and 20 are rejected under 35 USC 103(a) as being obvious over Carlucci et al. in view of Duey. The Examiner has not pointed out in either of the references where there is a teaching or suggestion that would motivate one skilled in the art to modify the Carlucci disclosure in view of Duey as suggested by the Examiner. Carlucci relates to an electric toothbrush whereas Duey is directed at a manual toothbrush. The Examiner cannot just assume that features of a bristle pattern on a prior art manual toothbrush will automatically be beneficial on an electric toothbrush reference. Applicants are not sure why claim 20 was included in this rejection as it calls for "a third tuft which is tilted at an angle which is different from the angle of tilt of the first and second tufts". In Duey all of the peripheral tufts are tilted at the same angle. As such, claims 1, 3-4 and 20 are not obvious in view of these two references.

Claims 1, 3-5 and 15-20 are rejected under 35 USC 103(a) as being unpatentable over Moskovich in view of Sekine. All of these claims call for a support member which is circular in shape. Of all the toothbrush heads disclosed in Moskovich, not one of them

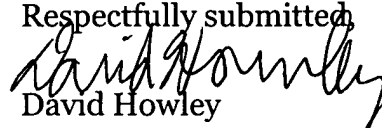
comes close to being circular in shape. The head is described in the abstract of Moskovich as being "narrow and thin" for maximum access to the oral cavity .

Further, of all the different bristle patterns shown in Moskovich, not one of them would be put on a head that was circular in shape by one skilled in the art. As shown in both Moskovich and Sekine, bristle patterns typically occupy a large majority of the head surface from which they project. To use a circular head with any of the bristle patterns in Moskovich would leave large portions (around 50%) of the head surface from which tufts project with no bristles at all. One skilled in the art would not make such a toothbrush.

Additionally, if one skilled in the art were to use one of the head shapes shown in Sekine with a Moskovich bristle pattern, there is no preference stated for the circular shape : why not use the square or hexagonal shape? The use of the square or hexagonal shape with Moskovich would not make the instant claims unpatentable. Finally, there is no teaching or suggestion in either of the references that would motivate one skilled in the art to apply the circular head of Sekine with a bristle pattern of Moskovich. For all of the above reasons, claims 1, 3-5 and 15-20 are not obvious in view of these two references.

Applicants want to thank the Examiner for indicating the allowability of claims 10-14. Applicants believe the present claims are now in condition for allowance and such action is earnestly requested.

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